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TRAVIS MOREDA DAIRY and TRAVIS
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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CALIFORNIANS FOR ALTERNATIVES TO
TOXICS,

Plaintiff,

vs.

TRAVIS MOREDA DAIRY and TRAVIS
MOREDA,

Defendants.

Case No. 3:24-CV-06632-SI

**STIPULATED REQUEST FOR ORDER
STAYING CASE (L.R. 6-1, 6-2);
[PROPOSED] ORDER**

*[Filed concurrently with Declaration of
Alexander Moore]*

*Assigned for all purposes to the
Honorable Susan Illston*

STIPULATION

This stipulation seeks the Court's order to stay this case and its current deadlines for approximately 90 days until September 22, 2025 to allow additional time for the Settlement Conference supervised by U.S. Magistrate Judge Peter H. Kang, including further discussions on an agreed-upon timeline between Plaintiff Californians for Alternatives to Toxics ("CAT") and Defendants Travis Moreda and Travis Moreda Dairy (collectively "TMD," and together with CAT, the "Parties")

Pursuant to Local Rules 6-1 and 6-2, and the accompanying Declaration of Alexander Moore, the Parties jointly declare the following in support of this request:

WHEREAS, on November 22, 2024, the Court granted TMD's Motion to Extend Time, extending TMD's time to respond to CATs' Complaint from November 25, 2024 to December 27, 2024, and extending all deadlines set by the Court's Initial Case Management Scheduling Order and ADR Deadlines by 30 days (ECF No. 11);

WHEREAS, on January 2, 2025, the Court granted TMD's Unopposed Motion for Extension of Time to File Answer, extending TMD's time to file its Answer from December 27, 2024 to December 30, 2024 (ECF No. 15);

WHEREAS, on January 27, 2025, the Court granted the Parties' Stipulated Request to Extend Deadlines Set by Court, extending the deadline for the Parties' joint case management statement until April 11, 2025, and setting the Initial Case Management Conference for April 18, 2025 (ECF No. 19);

WHEREAS, on April 8, 2025, the Court granted the Parties' Stipulated Request for Order Extending Initial Case Management Conference Dates, extending the deadline for the Parties' joint case management statement until July 11, 2025, and setting the Initial Case Management Conference for July 18, 2025 (ECF No. 23);

WHEREAS, on April 10, 2025, this case was referred to Magistrate Judge Kang for a settlement conference (ECF No. 25);

1 WHEREAS, on June 17, 2025, the Court resolved a discovery dispute by
2 extending TMD's deadlines to respond to CAT's first set of written discovery
3 requests from July 1, 2025 to August 1, 2025 and ordering that no depositions shall
4 occur before August 1, 2025 (ECF No. 29);

5 WHEREAS, On June 23, 2025, the Parties attended the Settlement
6 Conference before the Magistrate Judge Kang and agreed to stay this lawsuit for
7 approximately 90 days, from June 23, 2025, to September 22, 2025, to permit the
8 further exchange of documents under the Parties' confidentiality agreement dated
9 March 18, 2025;

10 WHEREAS, the Parties believe this further exchange of documents will
11 facilitate settlement discussions and may resolve this case while conserving the
12 expenditure of attorneys' fees and costs in litigation;

13 WHEREAS, the Parties therefore jointly request a stay of the entire case until
14 September 22, 2025, including a continuance of the Initial Case Management
15 Conference for approximately 90 days, to a date convenient for the Court's calendar,
16 and a corresponding continuance of the deadline for the joint case management
17 statement.

18 WHEREFORE, the Parties hereby stipulate and respectfully request that the
19 Court stay this entire case and continue all case deadlines as follows:

- 20 (1) The deadline for the Parties to file their joint case management statement
21 will be extended from July 11, 2025 to October 10, 2025;
- 22 (2) The date for the Court to hold its initial Case Management Conference will
23 be extended from July 18, 2025 to October 17, 2025; and
- 24 (3) The deadline for TMD to respond to CAT's first set of written discovery
25 requests will be extended from August 1, 2025 to at least September 22,
26 2025, no depositions notices shall be served prior to September 22, 2025,
27 and the Parties will abide by the Civil Local Rule 30-1 in scheduling
28 depositions. Promptly after July 21, 2025 (and no later than July 28, 2025),

the Parties agree that (a) if settlement discussions or other agreed exchanges of information are ongoing (or other resolution is reasonably foreseeable) at that time, the Parties will meet and confer to finalize a further stipulation to extend the deadline for TMD to respond to CAT's first set of written discovery requests to a mutually agreeable later date that makes sense in light of the ongoing discussions (where neither Party will unreasonably withhold consent to a reasonable extension of at least one month), and (b) if further settlement discussions or other possible resolution are not going to go forward at that time, confirm that the response date for the written discovery requests shall be September 22, 2025. Nothing herein prevents the Parties from agreeing to further extend or alter these discovery deadlines as circumstances change, and neither Party waives any right to timely seek appropriate relief as to any discovery or case management scheduling issues.

Respectfully submitted,

Dated: July 1, 2025

KING & SPALDING LLP

By: /s/ Alexander Moore
Alexander Moore

Attorneys for Defendants

Dated: July 1, 2025

LAW OFFICE OF WILLIAM CARLON


By: /s/ William N. Carlon
William N. Carlon

Signature authority
granted via email
on 7/1/2025

Attorneys for Plaintiff

PURSUANT TO STIPULATION, AND GOOD CAUSE SHOWN, IT IS SO ORDERED.

Dated: July 1, 2025


Honorable Susan Illston
United States District Judge